

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Criminal No. 20-048 (JRT/LIB)

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UNITED STATES OF AMERICA,

Plaintiff,

JOINT MOTION FOR  
EXCLUSION OF TIME

v.

MARILYN JACKSON,

Defendant.

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Defendant's counsel, Kevin C. Cornwell, and the United States of America, through its attorney, Special Assistant United States Attorney Lindsey E. Middlecamp, jointly move this Court for an exclusion of time for purposes of calculating Defendant's right to a speedy trial under Title 18, United States Code, Section 3161 and the Sixth Amendment.

Specifically, the parties move that the days running from June 4, 2020 until Defendant either a) appears for a plea hearing or b) notifies the Court and the United States that no plea hearing is requested be excluded from speedy trial calculations pursuant to Title 18, United States Code, Section 3161(1)(G) and (h)(3).

The United States provided the Defendant with a proposed plea agreement on June 4, 2020. Defendant's counsel requested certain modifications to the written agreement, and a revised agreement was provided on July 6, 2020. As a result of COVID-19 and the

lack of in-person opportunities to discuss the plea agreement at length, communications between Defendant's counsel and Defendant have faced unique obstacles. Nonetheless, counsel, in good faith, believe that a resolution is likely. Defendant met with her attorney via Zoom on July 17, 2020 and has a subsequent meeting scheduled for the week of July 20, 2020 to address remaining questions.

In the interim, and consistent with General Order 17 issued by the District of Minnesota, the parties request that all speedy trial calculations be halted, with all days from June 4, 2020 until Defendant either a plea hearing is held or the Defendant provides notice that no plea hearing is requested. The parties agree that the ends of justice are served by ordering the exclusion of time.

Respectfully submitted,

Dated: July 17, 2020

**s/Kevin C. Cornwell**

Kevin C. Cornwell, #023767X  
Attorney for Ms. Jackson  
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Dated: July 17, 2020

ERICA H. MacDONALD  
United States Attorney

**s/Lindsey E. Middlecamp**

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